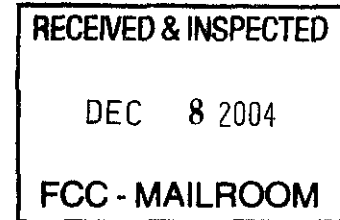




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December 6, 2004

ORIGINAL

EXPARTECOMMUNICATION

Chairman Michael Powell
Federal Communications Commission
The Portals
445 12th Street, S.W., TW-A325
Washington, DC 20554

Re: Access to Unbundled Network Elements, WC Docket No. 03-225

Dear Chairman Powell:

I am writing to urge you to urge you to keep competitive options in the local market. We, Pay Phone Service Providers, need to have clecs and une-p is necessary for our survival. Please don't throw us back to the wolf (Qwest). It isn't fair that AT&T opened their network but the RBOC are slamming the door on clecs now that they are allowed in the LD marketplace. Make them keep there promise to open their network in exchange for selling LD in their monopoly area.

Don't believe that Qwest is selling at artificially low rates to their competitors. The line rate for Public Access lines in Arizona is less than une-p. The NST line has a reasonable return on their investment yet it is the least expensive line available. The PAL line is less than residential lines. Qwest already is price squeezing our clec.

As the Commission has long recognized, payphones play a critical role in meeting the needs of the public for communications on the move – especially in emergencies and in disasters such as 9/11. And for many citizens, payphones are the only telephones they can use. That is why Congress mandated wide availability of service in the Telecommunications Act. To continue in providing payphone services, my company must have reliable local service connections at a reasonable cost. This is so because my local phone bill is my single largest monthly cost of operating my phones. To keep service quality high and costs low, we rely on

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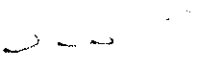
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the availability of competitive telephone companies for local service. Without competitive local service options like UNE-P, there is no market check on what we may be charged by the incumbent telephone company.

For our payphones, the only competitive alternative that has proved effective to date is UNE-P. Our payphones do not transmit data and do not need broadband channels; thus, broadband facilities do not provide a viable competitive alternative for our payphones. In the last few years, we have had to remove a large number of our payphones from service because their revenue was insufficient to meet operating costs. Without UNE-P, the American public is sure to lose more of the valuable payphone services they need and rely on today.

Therefore, I urge you to take steps to ensure that the FCC's revised UNE rules preserve competitive local service alternatives for payphones. Thank you for your consideration.

Sincerely,


David Riggle, President

Cc: John McCain
John Kyl
J.D. Hayworth